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**VIA ECF**

Hon. Philip M. Halpern  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Re: Coakley v. Iannuzzi and Valentin  
Index No.: 20-cv-5970


Dear Judge Halpern:

My office represents the plaintiff in the above-mentioned matter. I respectfully submit this joint on behalf of both parties in response to the Court's request a 45-day extension in case for the purpose of completing depositions. Both sides have attempted to reach a resolution in this matter but have not been successful.

At this point, both sides have exchanged documents in this case, party depositions have been scheduled, and Mr. Smith has informed me that he would like to hold one third-party deposition. My office has agreed to produce this witness and we have confirmed his availability for early May. We kindly ask that the deposition deadline in this case be extended 45 days (from 4/5 to 5/20) to accommodate this scheduling.

Additionally, we ask that the 4/7 case management conference be adjourned to a date following this deadline that would be convenient for the Court. We thank the Court for its courtesies and will provide further updates as requested.

Sincerely,

  
Michael H. Sussman, Esq.

cc: Alex Smith, Esq., via ECF

Application granted.

The parties are directed to file jointly a proposed Amended Civil Case Discovery Plan and Scheduling Order revising the discovery schedule in this matter. The parties are directed to use the most recent version of the form available on this Court's Individual webpage.

The Case Management Conference scheduled for April 7, 2021 is cancelled. The Clerk of the Court is respectfully directed to terminate the motion sequence pending at Doc. 12.

SO ORDERED.

  
Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
April 6, 2021